

# **MASTER APPENDIX**

**Master Appendix — Summary of Defendant's Motion to Dismiss**

<b>Subject of Motion to Dismiss</b>	<b>Relevant Memorandum of Law</b>	<b>Summary of Requested Relief</b>
Antitrust	Joint Memorandum of Law In Support of Defendants' Motion to Dismiss All Antitrust Claims Based on the Efficient Enforcer Doctrine	Schedule A
Personal Jurisdiction	Joint Memorandum of Law in Support of Defendants' Motion to Dismiss All Antitrust Claims for Lack of Personal Jurisdiction	Schedule B
Venue	Joint Memorandum of Law in Support of Defendants' Motion to Dismiss All Antitrust Claims for Lack of Personal Jurisdiction	Schedule C

**A**

**Schedule A — Antitrust**

<b>Complaints Asserting Antitrust Claims</b>	<b>Relevant Claims for Relief</b>	<b>Type of Antitrust Claim Asserted</b>	<b>Relief Requested</b>
<i>Gelboim v. Credit Suisse Grp. AG</i> , No. 12-cv-1025	No. 1	Federal	Dismissal of all antitrust claims as to all Defendants in all actions
<i>Metzler Inv. GmbH v. Credit Suisse Grp. AG</i> , No. 11-cv-2613	No. 5	Federal	
<i>Mayor and City of Baltimore v. Credit Suisse Grp.</i> , No. 11-cv-5450	No. 1	Federal	
<i>Charles Schwab Bank, N.A. v. Bank of Am. Corp.</i> , No. 11-cv-6411.	No. 1, 3	Federal, California	
<i>Schwab Money Mkt. Fund v. Bank of Am. Corp.</i> , No. 11-cv-6412	No. 1, 3	Federal, California	
<i>Schwab Short-Term Bond Mkt. Fund. v. Bank of Am. Corp.</i> , No. 11-cv-6409	No. 1, 3	Federal, California	
<i>Amabile v. Bank of Am. Corp.</i> , No. 13-cv-1700	No. 5	Federal	
<i>Bay Area Toll Auth. v. Bank of Am. Corp.</i> , No. 14-cv-3094	Nos. 1, 3	Federal; California (asserted for preservation purposes only)	
<i>City of Houston v. Bank of Am. Corp.</i> , No. 13-cv-5616	Nos. 8-9	Federal; Texas	
<i>City of Phila. v. Bank of Am. Corp.</i> , No. 13-cv-6020	No. 14	Federal (asserted for preservation purposes only)	
<i>Darby Fin. Prod. v. Barclays Bank PLC</i> , No. 13-cv-8799	No. 13	Federal	
<i>Fed. Deposit Ins. Corp. v. Bank of Am. Corp.</i> , No. 14-cv-1757	Nos. 23-24	Federal; New York	
<i>Fed. Home Loan Mortg. Corp. v. Bank of Am. Corp.</i> , No. 13-cv-3952	No. 1	Federal	
<i>Nat'l Credit Union Admin Bd. v. Credit Suisse Grp. Ag.</i> , <sup>5</sup> No. 13-cv-7394	Nos. 1-2	Federal; California; Illinois; Kansas	

<sup>5</sup> NCUA lists two non-existent entities, “Credit Suisse Group International” and “Rabobank International” as defendants in the caption of its complaint. “Rabobank International” is the name by which Rabobank is referred outside of the Netherlands, but is not a legal entity separate from Rabobank. These entities should be dismissed.

Complaints Asserting Antitrust Claims	Relevant Claims for Relief	Type of Antitrust Claim Asserted	Relief Requested
<i>Principal Fin. Grp., Inc. v. Bank of Am. Corp.</i> , No. 13-cv-6014	Nos. 1-2	Federal; New York	
<i>Principal Funds, Inc. v. Bank of Am. Corp.</i> , No. 13-cv-6013	Nos. 1-2	Federal; New York	
<i>Prudential Inv. Portfolios 2 v. Bank of Am. Corp.</i> , No. 14-cv-4189	No. 11	Federal (asserted for preservation purposes only)	
<i>The Regents of the Univ. of Cal. v. Bank of Am. Corp.</i> , <sup>6</sup> No. 13-cv-5186	Nos. 8-9	Federal; California (asserted for preservation purposes only)	
<i>Salix Capital US Inc. v. Banc of Am. Sec. LLC</i> , No. 13-cv-4018	No. 22	Federal	

<sup>6</sup> This complaint consolidates the actions by California municipalities previously filed as *City of Riverside* (13-cv-0597) (C.D. Cal.), *Cnty. of San Mateo* (13-cv-0625) (N.D. Cal.), *E. Bay Mun. Util. Dist.* (13-cv-0626) (N.D. Cal.), *City of Richmond* (13-cv-0627) (N.D. Cal.), *Cnty. of San Diego* (13-cv-0667) (S.D. Cal.), *Cnty. of Sonoma* (13-cv-5187) (N.D. Cal.), *San Diego Ass'n of Gov'ts* (13-cv-5221) (S.D. Cal.), *Cnty. of Sacramento* (13-cv-5569) (E.D. Cal.), *Cnty. of Mendocino* (13-cv-8644) (N.D. Cal.).

**B**

**Schedule B — Personal Jurisdiction**

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Ellen Gelboim, et al., v. Credit Suisse Group AG, et al., No. 12-cv-1025</i>	S.D.N.Y.	Barclays Bank plc BTMU <sup>1</sup> CSGAG <sup>2</sup> Deutsche Bank AG HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG <sup>3</sup> Rabobank <sup>4</sup> RBS Group <sup>5</sup> Royal Bank of Canada UBS AG WestImmo AG <sup>6</sup>	Dismissal for lack of personal jurisdiction as to all federal and state antitrust claims.
<i>Mayor and City of Baltimore, et al. v. Credit Suisse Group AG, et al., No. 11-cv-5450</i>	S.D.N.Y.	BTMU CSGAG Credit Suisse International Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	

<sup>1</sup> The Bank of Tokyo-Mitsubishi UFJ, Ltd. will be referred to as “BTMU” throughout this Schedule.

<sup>2</sup> Credit Suisse Group AG will be referred to as “CSGAG” throughout this Schedule.

<sup>3</sup> Formerly known as WestLB AG.

<sup>4</sup> Coöperatieve Rabobank U.A. (f/k/a Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A.) will be referred to as “Rabobank” throughout this Schedule.

<sup>5</sup> The Royal Bank of Scotland Group plc will be referred to as “RBS Group” throughout this Schedule.

<sup>6</sup> Westdeutsche ImmobilienBank AG will be referred to as “WestImmo AG” throughout this Schedule.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Amabile v. Bank of Am. Corp., No. 13-cv-1700</i>	S.D.N.Y.	Barclays Bank plc BTMU CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC <sup>7</sup> Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada UBS AG	
<i>Bay Area Toll Auth. v. Bank of Am. Corp., et al., No. 14 Civ. 3094</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BBA BBA Enterprises Ltd. BBA LIBOR Ltd. BTMU Citigroup Financial Products, Inc. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada UBS AG WestImmo AG	

<sup>7</sup> HSBC Bank plc is not named in the case caption but is referred to as a defendant in ¶ 65 of the Amended Complaint.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Regents of the Univ. of Cal. v. Bank of Am. Corp., et al., No. 13 Civ. 05186</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citigroup, Inc. Citibank, N.A. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JP Morgan Chase & Co. JP Morgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	
<i>East Bay Municipal Utility Dist. v. Bank of Am. Corp., No. 13-cv-0626 (CM)</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>San Diego Ass'n of Gov. v. Bank of Am. Corp., et al., No. 13 Civ. 05221</i>	S.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	
<i>City of Richmond, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 00627</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>City of Riverside, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 00597</i>	C.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	
<i>Cnty. of Mendocino v. Bank of Am. Corp., et al., No. 13 Civ. 08644</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Cnty. of Sacramento v. Bank of Am., et al., No. 13 Civ.05569</i>	E.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. Deutsche Bank AG CSGAG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	
<i>Cnty. of San Diego v. Bank of Am. Corp., et al., No. 13 Civ. 00667</i>	S.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Cnty. of San Mateo, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 00625</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	
<i>Cnty. of Sonoma, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 05187</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Darby Fin. Products, et al. v. Barclays Bank plc, et al., No. 13 Civ. 08799</i>	N.Y. Sup. Ct.	Barclays Bank plc Deutsche Bank AG J.P. Morgan Dublin plc RBS plc <sup>8</sup> UBS AG UBS Limited	
<i>Fed. Deposit Ins. Corp. as Receiver for 38 Closed Banks v. Bank of Am. Corp., No. 14-cv-1757</i>	S.D.N.Y.	Barclays Bank plc BBA BBA Enterprises Ltd. BBA LIBOR Ltd. BTMU CSGAG Credit Suisse International Deutsche Bank AG HBOS PLC HSBC Bank PLC <sup>9</sup> The Hongkong and Shanghai Banking Corp. Ltd. JPMorgan Dublin plc JPMorgan Markets Limited Lloyds Banking Group PLC Lloyds Bank plc <sup>10</sup> MLIB <sup>11</sup> The Norinchukin Bank Portigon AG Rabobank RBS plc Royal Bank of Canada Société Générale UBS AG	

<sup>8</sup> The Royal Bank of Scotland plc will be referred to as “RBS plc” throughout this Schedule.

<sup>9</sup> HSBC Bank plc was substituted for HSBC Holdings plc, and HSBC Holdings plc was dismissed as a defendant, in this action in December 2014. (Dkt 909-1).

<sup>10</sup> Formerly known as Lloyds TSB Bank PLC.

<sup>11</sup> Merrill Lynch International Bank will be referred to as “MLIB” throughout this Schedule.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Fed. Home Loan Mortg. Corp. v. Bank of Am. Corp. et al., No. 13 Civ. 03952</i>	E.D. Va.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BBA BBA Enterprises Ltd. BBA LIBOR Ltd. BTMU Citibank, N.A. Citigroup Inc. CSGAG Credit Suisse International Deutsche Bank AG HBOS PLC HSBC Bank PLC <sup>12</sup> JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC Lloyds Bank plc The Norinchukin Bank Portigon AG Rabobank RBS Group RBS plc Royal Bank of Canada Société Générale UBS AG	

<sup>12</sup> HSBC Bank plc was substituted for HSBC Holdings plc, and HSBC Holdings plc was dismissed as a defendant, in this action in December 2014. (Dkt 909-1).

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>City of Houston v. Bank of Am. Corp., et al., No. 13 Civ. 05616</i>	S.D. Tex.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citibank, N.A. Citigroup Inc. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	
<i>City of Philadelphia, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 06020</i>	E.D. Pa.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc Citibank, N.A. Citigroup Financial Products Inc. CSGAG Deutsche Bank AG JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. RBS plc Royal Bank of Canada UBS AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Nat'l Credit Union Admin. Bd. v. Credit Suisse Grp. AG</i> (13-cv-7394)	D. Kan.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc Barclays Capital Inc. BTMU Citigroup Inc. Citibank, N.A. Citigroup Financial Products Inc. Citi Swapco Inc. CSGAG Credit Suisse Group International Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank USA, N.A. JPMorgan Chase & Co. JPMorgan Chase Bank N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank Rabobank International <sup>13</sup> RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	

<sup>13</sup> NCUA lists “Rabobank International” as a defendant in the caption of the complaint. “Rabobank International” is the name by which Rabobank is referred outside of the Netherlands. It is not a legal entity separate from Rabobank. It should be dismissed for this reason.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Principal Funds, Inc. v. Bank of Am. Corp.</i> (13-cv-6013)	S.D. Iowa	Bank of America Corporation Bank of America, N.A. Barclays Bank plc Barclays Capital Inc. BBA BBA Enterprises Ltd. BBA LIBOR Ltd. Citibank, N.A. Citigroup Inc. Citigroup Global Markets, Inc. CSGAG Credit Suisse AG Credit Suisse Securities (USA) LLC Deutsche Bank AG Deutsche Bank Securities, Inc. HBOS PLC JPMorgan Chase & Co. JPMorgan Chase Bank N.A. Lloyds Banking Group PLC Lloyds Bank plc Rabobank RBS Group RBS plc Royal Bank of Canada UBS AG UBS Securities LLC	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Principal Fin. Grp., Inc. v. Bank of Am. Corp.</i> (13-cv-6014)	S.D. Iowa	Bank of America Corporation Bank of America, N.A. Barclays Bank plc Barclays Capital Inc. BBA BBA Enterprises Ltd. BBA LIBOR Ltd. Chase Bank, USA, N.A. Citibank, N.A. Citigroup Inc. Citigroup Global Markets, Inc. CSGAG Credit Suisse AG Credit Suisse International Credit Suisse Securities (USA) LLC Deutsche Bank AG Deutsche Bank Securities, Inc. HBOS PLC JPMorgan Chase & Co. JPMorgan Chase Bank N.A. J.P. Morgan Dublin plc Lloyds Banking Group PLC Lloyds Bank plc MLCS <sup>14</sup> Rabobank RBS Group RBS plc Royal Bank of Canada UBS AG UBS Securities LLC	

<sup>14</sup>

Merrill Lynch Capital Services, Inc. will be referred to as "MLCS" throughout this Schedule.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Prudential Investment Portfolios 2 v. Bank of Am. Corp., et al.,</i> No. 14 Civ. 04189	D.N.J.	Bank of America Corporation Bank of America, N.A. Barclays plc Barclays Bank plc Barclays Capital Inc. Citibank, N.A. Citigroup Funding Inc. Citigroup Global Markets, Inc. CSGAG Credit Suisse AG Credit Suisse (USA) Inc. Credit Suisse Securities (USA) LLC Deutsche Bank AG HSBC Bank PLC HSBC Holdings PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. RBS plc Royal Bank of Canada RBC Capital Markets, LLC UBS AG UBS Securities LLC	
<i>Salix Capital US Inc. v. Banc of Am. Sec. LLC, et al.,</i> No. 13 Civ. 04018	N.Y. Sup. Ct.	Barclays Bank plc CSGAG Credit Suisse AG Credit Suisse International Deutsche Bank AG RBS plc UBS AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Charles Schwab Bank, N.A. et al., v. Bank of Am. et al., No. 11-cv-6411</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citigroup Inc. Citibank, N.A. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings Plc HSBC Bank Plc JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada UBS AG UBS Securities LLC WestImmo AG	
<i>Schwab Money Market Fund, et al., v. Bank of Am. et al., No. 11-cv-6412</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BTMU Citigroup Inc. Citibank, N.A. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada UBS AG UBS Securities LLC WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Schwab Short-Term Bond Market Fund, et al., v. Bank of Am. et al., No. 11-cv-6409</i>	N.D. Cal.	Bank of America Corporation Bank of America, N.A. Barclays Bank plc BMTU Citigroup Inc. Citibank, N.A. CSGAG Deutsche Bank AG HBOS Plc HSBC Holdings PLC HSBC Bank PLC JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada UBS AG UBS Securities WestImmo AG	
<i>Metzler Investment GmbH v. Credit Suisse Group AG, et al., No. 11-cv-2613 (S.D.N.Y.)</i>  <u>Consolidated actions:</u>  11-cv-7676 (S.D.N.Y.)  11-cv-03739 <sup>†</sup>	S.D.N.Y. N.D. Ill. D. Minn. D. N.J.	BTMU CSGAG Deutsche Bank AG <sup>15</sup> HBOS plc HSBC Holdings PLC HSBC Bank plc Lloyds Banking Group PLC Lloyds Bank plc The Norinchukin Bank Portigon AG Rabobank RBS Group Royal Bank of Canada	

<sup>†</sup> Indicates an action consolidated with the “Exchange-Based Action” for pre-trial purposes where all named plaintiffs in the original actions have been removed as named plaintiffs in the consolidated complaints and, therefore, those actions have effectively been dismissed. However, in an abundance of caution, Defendants move against each of these abandoned actions on personal jurisdiction grounds. Separately, as all claims in *Maxwell van de Velde v. Bank of America, Corp., et al.*, No. 11-cv-6120 were voluntarily dismissed, Dkt. No. 149, there is no action to move against and Defendants have excluded it from this motion.

<sup>15</sup> While DB Group Services (UK) Ltd. (“DBGS”) is not a defendant in the operative complaint in the Exchange-Based Action, the Court has granted Exchange-Based Plaintiffs leave to add DBGS as a defendant in their proposed third amended complaint. However, DBGS contends that there is no personal jurisdiction over DBGS

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
(N.D. Ill.)		Société Générale UBS AG WestImmo AG	
11-cv-04047			
(N.D. Ill.)			
11-cv-04397			
(N.D. Ill.)			
11-cv-01901 <sup>†</sup>			
(D. Minn.)			
11-cv-4736 <sup>†</sup>			
(S.D.N.Y.)			
11-cv-3423			
(S.D.N.Y.)			
11-cv-03847			
(D.N.J.)			
11-cv-02625 <sup>†</sup>			
(N.D. Ill.)			
11-cv-02824 <sup>†</sup>			
(N.D. Ill.)			
11-cv-02706 <sup>†</sup>			
(N.D. Ill.)			

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with respect to Exchange-Based Plaintiffs' antitrust claims based on the allegations in their proposed complaint. DBGS reserves all rights to bring a motion to dismiss on that basis at the appropriate time.

C

**Schedule C — Venue**

<b>Amended Complaint</b>	<b>Jurisdiction Filed</b>	<b>Defendants Moving to Dismiss</b>	<b>Relief Requested</b>
<i>Ellen Gelboim, et al., v. Credit Suisse Group AG, et al., No. 12-cv-1025</i>	S.D.N.Y.	CSGAG <sup>1</sup> HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC RBS Group <sup>2</sup>	Dismissal for lack of venue as to all federal and state antitrust claims.
<i>Mayor and City of Baltimore, et al. v. Credit Suisse Group AG, et al., No. 11-cv-5450</i>	S.D.N.Y.	CSGAG Credit Suisse International HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC RBS Group	
<i>Amabile v. Bank of Am. Corp., No. 13-cv-1700</i>	S.D.N.Y.	CSGAG HBOS PLC HSBC Holdings PLC HSBC Bank PLC <sup>3</sup> Lloyds Banking Group PLC RBS Group	

<sup>1</sup> Credit Suisse Group AG will be referred to as “CSGAG” throughout this Schedule.

<sup>2</sup> The Royal Bank of Scotland Group plc will be referred to as “RBS Group” throughout this Schedule.

<sup>3</sup> HSBC Bank plc is not named in the case caption but is referred to as a defendant in ¶ 65 of the Amended Complaint.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Bay Area Toll Auth. v. Bank of Am. Corp., et al., No. 14 Civ. 3094</i>	N.D. Cal.	Barclays Bank plc BBA BBA Enterprises Ltd. BBA LIBOR Ltd. CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG <sup>4</sup> Rabobank <sup>5</sup> RBS Group WestImmo AG <sup>6</sup>	
<i>Regents of the Univ. of Cal. v. Bank of Am. Corp., et al., No. 13 Civ. 05186</i>	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale WestImmo AG	

<sup>4</sup> Formerly known as WestLB AG.

<sup>5</sup> Coöperatieve Rabobank U.A. (f/k/a Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A.) will be referred to as “Rabobank” throughout this Schedule.

<sup>6</sup> Westdeutsche ImmobilienBank AG will be referred to as “WestImmo AG” throughout this Schedule.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>East Bay Municipal Utility Dist. v. Bank of Am. Corp., No. 13-cv-0626 (CM)</i>	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale WestImmo AG	
<i>San Diego Ass'n of Gov. v. Bank of Am. Corp., et al., No. 13 Civ. 05221</i>	S.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale UBS AG WestImmo AG	
<i>City of Richmond, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 00627</i>	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>City of Riverside, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 00597</i>	C.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale WestImmo AG	
<i>Cnty. of Mendocino v. Bank of Am. Corp., et al., No. 13 Civ. 08644</i>	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale WestImmo AG	
<i>Cnty. of Sacramento v. Bank of Am., et al., No. 13 Civ.05569</i>	E.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale UBS AG WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Cnty. of San Diego v. Bank of Am. Corp., et al., No. 13 Civ. 00667</i>	S.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale UBS AG WestImmo AG	
<i>Cnty. of San Mateo, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 00625</i>	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale WestImmo AG	
<i>Cnty. of Sonoma, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 05187</i>	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group Société Générale WestImmo AG	
<i>Darby Fin. Products, et al. v. Barclays Bank plc, et al., No. 13 Civ. 08799</i>	N.Y. Sup. Ct.	UBS Limited	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Fed. Deposit Ins. Corp. as Receiver for 38 Closed Banks v. Bank of Am. Corp., No. 14-cv-1757</i>	S.D.N.Y.	BBA BBA Enterprises Ltd. BBA LIBOR Ltd CSGAG Credit Suisse International HBOS PLC HSBC Bank PLC <sup>7</sup> The Hongkong and Shanghai Banking Corporation Ltd. Lloyds Banking Group PLC MLIB <sup>8</sup>	
<i>Fed. Home Loan Mortg. Corp. v. Bank of Am. Corp. et al., No. 13 Civ. 03952</i>	E.D. Va.	Barclays Bank plc BBA BBA Enterprises Ltd. BBA LIBOR Ltd. BTMU CSGAG Credit Suisse International Deutsche Bank AG HBOS PLC HSBC Bank PLC <sup>9</sup> Lloyds Banking Group PLC Lloyds Bank plc <sup>10</sup> The Norinchukin Bank Portigon AG Rabobank RBS Group RBS plc <sup>11</sup> Royal Bank of Canada Société Générale UBS AG	

<sup>7</sup> HSBC Bank plc was substituted for HSBC Holdings plc, and HSBC Holdings plc was dismissed as a defendant, in this action in December 2014. (Dkt 909-1).

<sup>8</sup> Merrill Lynch International Bank will be referred to as “MLIB” throughout this Schedule.

<sup>9</sup> HSBC Bank plc was substituted for HSBC Holdings plc, and HSBC Holdings plc was dismissed as a defendant, in this action in December 2014. (Dkt 909-1).

<sup>10</sup> Formerly known as Lloyds TSB Bank PLC.

<sup>11</sup> The Royal Bank of Scotland plc will be referred to as “RBS plc” throughout this schedule.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>City of Houston v. Bank of Am. Corp., et al., No. 13 Civ. 05616</i>	S.D. Tex.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group UBS AG WestImmo AG	
<i>City of Philadelphia, et al. v. Bank of Am. Corp., et al., No. 13 Civ. 06020</i>	E.D. Pa.	Barclays Bank plc CSGAG Deutsche Bank AG RBS plc UBS AG	
<i>Nat'l Credit Union Admin. Bd. v. Credit Suisse Grp. AG (13-cv-7394)</i>	D. Kan.	Barclays Bank plc Barclays Capital Inc. BTMU CSGAG Credit Suisse Group International Deutsche Bank AG HBOS PLC HSBC Holdings PLC HSBC Bank USA, N.A. Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank Rabobank International <sup>12</sup> RBS Group Royal Bank of Canada Société Générale UBS AG WestImmo AG	

<sup>12</sup> NCUA lists “Rabobank International” as a defendant in the caption of the complaint. “Rabobank International” is the name by which Rabobank is referred outside of the Netherlands. It is not a legal entity separate from Rabobank. It should be dismissed for this reason.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Principal Funds, Inc. v. Bank of Am. Corp.</i> (13-cv-6013)	S.D. Iowa	Barclays Bank plc Barclays Capital Inc. BBA BBA Enterprises Ltd. BBA LIBOR Ltd. CSGAG Credit Suisse AG Credit Suisse Securities (USA) LLC Deutsche Bank AG Deutsche Bank Securities, Inc. HBOS PLC Lloyds Banking Group PLC Lloyds Bank plc Rabobank RBS Group RBS plc Royal Bank of Canada US AG UBS Securities LLC	
<i>Principal Fin. Grp., Inc. v. Bank of Am. Corp.</i> (13-cv-6014)	S.D. Iowa	Barclays Bank plc Barclays Capital Inc. BBA BBA Enterprises Ltd. BBA LIBOR Ltd. CSGAG Credit Suisse AG Credit Suisse International Credit Suisse Securities (USA) LLC Deutsche Bank AG Deutsche Bank Securities, Inc. HBOS PLC Lloyds Banking Group PLC Lloyds Bank plc Rabobank RBS Group RBS plc Royal Bank of Canada UBS AG UBS Securities LLC	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Prudential Investment Portfolios 2 v. Bank of Am. Corp., et al., No. 14 Civ. 04189</i>	D.N.J.	Barclays plc Barclays Bank plc Barclays Capital Inc. CSGAG Credit Suisse AG Credit Suisse (USA) Inc. Credit Suisse Securities (USA) LLC Deutsche Bank AG HSBC Holdings PLC HSBC Bank PLC Royal Bank of Canada UBS AG UBS Securities LLC	
<i>Salix Capital US Inc. v. Banc of Am. Sec. LLC, et al., No. 13 Civ. 04018</i>	N.Y. Sup. Ct.	CSGAG Credit Suisse International	
<i>Charles Schwab Bank, N.A. et al., v. Bank of Am. et al., No. 11-cv-6411</i>	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS plc HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group WestImmo AG	
<i>Schwab Money Market Fund, et al., v. Bank of Am. et al., No. 11-cv-6412</i>	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG HBOS plc HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC The Norinchukin Bank Portigon AG Rabobank RBS Group WestImmo AG	

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
<i>Schwab Short-Term Bond Market Fund, et al., v. Bank of Am. et al.,</i> No. 11-cv-6409	N.D. Cal.	Barclays Bank plc CSGAG Deutsche Bank AG Lloyds Banking Group PLC HBOS plc HSBC Holdings PLC HSBC Bank PLC The Norinchukin Bank Portigon AG Rabobank RBS Group WestImmo AG	
<i>Metzler Investment GmbH v. Credit Suisse Group AG, et al.,</i> No. 11-cv-2613 (S.D.N.Y.)  <u>Consolidated actions:</u>  11-cv-7676 (S.D.N.Y.)  11-cv-03739 <sup>†</sup> (N.D. Ill.)  11-cv-04047 (N.D. Ill.)  11-cv-04397 (N.D. Ill.)	S.D.N.Y. N.D. Ill. D. Minn. D. N.J.	CSGAG Deutsche Bank AG* HBOS plc HSBC Holdings PLC HSBC Bank PLC Lloyds Banking Group PLC Lloyds Bank plc* The Norinchukin Bank* Portigon AG* Rabobank RBS Group Royal Bank of Canada* Société Générale <sup>13</sup> UBS AG <sup>14</sup> WestImmo AG*	

<sup>†</sup> Indicates an action consolidated with the “Exchange-Based Action” for pre-trial purposes where all named plaintiffs in the original actions have been removed as named plaintiffs in the consolidated complaints and, therefore, those actions have effectively been dismissed. However, in an abundance of caution, Defendants move against each of these abandoned actions on venue grounds. Separately, as all claims in *Maxwell van de Velde v. Bank of America, Corp., et al.*, No. 11-cv-6120 were voluntarily dismissed, Dkt. No. 149, there is no action to move against and Defendants have excluded it from this motion.

\* Indicates defendant is not moving as to New York.

<sup>13</sup> Société Générale is not moving as to Illinois or New York.

<sup>14</sup> UBS AG is not moving as to Illinois or New York.

Amended Complaint	Jurisdiction Filed	Defendants Moving to Dismiss	Relief Requested
11-cv-01901 <sup>†</sup> (D. Minn.)			
11-cv-4736 <sup>†</sup> (S.D.N.Y.)			
11-cv-3423 (S.D.N.Y.)			
11-cv-03847 (D.N.J.)			
11-cv-02625 <sup>†</sup> (N.D. Ill.)			
11-cv-02824 <sup>†</sup> (N.D. Ill.)			
11-cv-02706 <sup>†</sup> (N.D. Ill.)			